

**Regulatory Stakeholder Subgroup Teleconference
for Surface Coating of Plastic Parts**
Telecon Summary - June 16, 1998

The following is a summary of the first conference call of the regulatory stakeholder subgroup for the presumptive maximum achievable control technology (P-MACT) phase of the regulatory development process for the surface coating of plastic parts. The conference call was held on June 16, 1998. An agenda for the conference call is included as attachment A.

Teleconference participants are listed in attachment B.

Introduction

Bruce Moore, EPA's project lead, thanked the attendees for their participation. He explained that the project to regulate HAP (hazardous air pollutants) and VOC (volatile organic compounds) from the use of coatings on plastic parts started in April 1997. A total of three general stakeholder meetings have been held in Research Triangle Park, North Carolina. A fourth meeting of the entire stakeholder group is tentatively scheduled for September. Mr. Moore invited regulatory subgroup participants to attend the meeting. He noted that all regulatory subgroup participants will be added to the general stakeholder contact list to receive information on the project periodically, as well as notices for upcoming stakeholder meetings.

P-MACT and Role of the Regulatory Subgroup

Mr. Moore stated that EPA is in the initial stages of determining MACT for plastic parts surface coating. Currently, EPA is engaged in the presumptive MACT (P-MACT) process in which EPA collects and summarizes readily available data to characterize the industry, emissions, and typical control techniques. The goal of P-MACT is to determine what the MACT standard would be if it were based solely on readily available information. The purpose of P-MACT is to assist States in making case-by-case MACT determinations for new or reconstructed sources. If EPA decides that P-MACT cannot be determined, then the Agency will summarize the information that has been gathered during the P-MACT process to assist States in the interim until the MACT standard is developed.

Mr. Moore explained that EPA has not acquired enough information to date to make a P-MACT determination. The EPA will be summarizing the P-MACT process and the information that has been collected in a P-MACT document. A draft of this document is currently being developed. Mr. Moore described the role of the regulatory subgroup as reviewing the draft P-MACT document prior to its release to the broad stakeholder group. The draft is tentatively scheduled to be distributed to the regulatory subgroup in early August, at which time participants will have two weeks to review and comment on it. Comments must be submitted in writing to EPA. A conference call to discuss regulatory subgroup comments will be held the week of August 18. [Due to changes in the P-MACT schedule, the regulatory subgroup will not be reviewing the document prior to its release to the broad stakeholder group. Regulatory subgroup participants will be asked to review and comment on the document when it is released to all stakeholders the first or second week of August. Stakeholders will have approximately three to four weeks to provide comments to EPA. A general stakeholder meeting will be held mid-September to discuss stakeholder comments.] The EPA will revise the P-MACT document and must finalize it by the end of September. Mr. Moore added that all of the 10-year MACT coating projects currently under development must complete their P-MACT documents by the end of September.

Project Status

Determining P-MACT is the first stage in the development of the MACT standards and begins with data collection by various means, including site visits and industry questionnaires. Greg DeAngelo, Eastern Research Group, Inc. (ERG), EPA's contractor for the project, stated that five facilities have already been visited. Three of the facility visits were conducted at heavy duty truck manufacturing sites and two were conducted at miscellaneous plastic products manufacturing sites. Mr. DeAngelo explained that the choice of the truck manufacturing sites was to assess concerns expressed by the Truck Manufacturing Association which has been active during the P-MACT process. They believe that their industry has special, coating related concerns. For example, metal and plastic are often coated together in the truck manufacturing process yet the coating of miscellaneous metal parts are being covered under a separate rule from the coating of plastic parts. Trip reports will be available in the project docket. Upcoming site

visits include two automotive assembly sites (one U.S. manufacturer and one international manufacturer), a facility which performs adhesives application, and a site using innovative technologies, such as UV (ultraviolet) or powder coatings. Teleconference participants were asked to advise EPA of any site visits that they believe would be beneficial to the project. Fred Lettice, California South Coast Air Quality Management District (SCAQMD), stated that he is unaware of any plastics coating facilities in the South Coast District using UV or powder coatings, but offered to check.

Mr. Moore explained that EPA is also preparing to distribute an industry questionnaire. A generic questionnaire has been developed by EPA for use by all the MACT projects, but EPA may develop alternative, project-specific questionnaires. Mr. Moore stated that EPA is in the process of developing an alternative to the generic questionnaire for the plastic parts surface coating project. A draft of the alternative questionnaire is posted on EPA's TTN (technology transfer network) website. [The questionnaire can be accessed at www.epa.gov/ttn/uatw/coat/plastic/plas_parts.html.] Mr. DeAngelo invited the regulatory subgroup participants to review the draft questionnaire and provide comments to him by June 30.

Mr. DeAngelo explained that the questionnaire will be sent to facilities that have been identified as performing plastic parts coating as part of their industrial operations. Plastic parts coating facilities have been located by various means, including information that has been provided by State agencies and database searches. Mr. Lettice asked if there is a facility size cutoff for distribution of the questionnaires. Mr. DeAngelo stated that all facilities will be receiving the questionnaire regardless of size. Mr. Lettice also asked if EPA has received facility information from the SCAQMD. Mike Bryant and Heather Wright, ERG, indicated that several individuals at SCAQMD have been contacted and that they believe EPA has received information on facilities performing plastics coating in that District. Mike Bryant offered to verify the information and will follow up with Mr. Lettice.

The tentative date for mailout of the industry questionnaire is July 15. Based on this date, EPA anticipates that information from completed surveys will start to be compiled and entered into a database beginning mid to late August and data analysis will begin in late September. [It is anticipated that data entry will continue through the fall and that data analysis will continue through January 1999.]

ATTACHMENT A

Agenda Plastic Parts Surface Coating Regulatory Stakeholder Subgroup Teleconference

Tuesday, June 16, 1998 from 11 a.m - 12 p.m. (EST)
Call-in number (919) 541-4486

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|-------|---|---|---------------------------|
| 11:00 | Introduction | - | Bruce Moore |
| | • Roll call | | |
| | • Background information | | |
| 11:10 | Project Status | - | Bruce Moore/Greg DeAngelo |
| | • P-MACT process and history | | |
| | • Site visits | | |
| | • Industry surveys/information collection | | |
| | • P-MACT document and role of the regulatory subgroup | | |
| 11:35 | Plan for P-MACT document | - | Bruce Moore |
| | • Review of draft P-MACT by regulatory subgroup | | |
| | • Next meeting | | |
| 11:50 | Feedback: questions/comments/concerns | - | Subgroup participants |
| 12:00 | Adjourn | | |

ATTACHMENT B

TELECONFERENCE PARTICIPANTS

Karen Borel, U.S. Environmental Protection Agency, Region 4
Mike Bryant, Eastern Research Group, Inc.
Susan Buchanan, Eastern Research Group, Inc.
Stacey Coburn, Ohio Environmental Protection Agency
Greg DeAngelo, Eastern Research Group, Inc.
Fred Lettice, South Coast Air Quality Management District
Bruce Moore, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards
Van Phan, South Coast Air Quality Management District
Steve Rosenthal, U.S. Environmental Protection Agency, Region 5
Jason Schnepf, Illinois Environmental Protection Agency
(sitting in for Hank Naour, IL EPA)
Jerry Trautman, Michigan Department of Environmental Quality
(sitting in for Bob Irvine, MI DEQ)
Jerry Wamsley, U.S. Environmental Protection Agency, Region 9
Heather Wright, Eastern Research Group, Inc.